

ALEX G. TSE (CABN 152348)
United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

ELISE LAPUNZINA (NYBN 2540730)
S. WAQAR HASIB (CABN 234818)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
elise.lapunzina@usdoj.gov; 415-436-6878
waqar.hasib@usdoj.gov; 415-436-7261

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:15-CR-582-WHO
)	
Plaintiff,)	STIPULATION AND
)	[PROPOSED] ORDER EXCLUDING TIME
v.)	UNDER THE SPEEDY TRIAL ACT
)	
ADAM SHAFI,)	
)	
Defendant.)	
)	
)	

The parties appeared before the Court for a hearing on September 20, 2018. The parties, with the consent of the defendant, requested and agreed that the time between September 20, 2018, and September 27, 2018, should be excluded from computation under the Speedy Trial Act for effective preparation of counsel. In light of the Court's earlier findings, there is good cause to exclude time under the Speedy Trial Act as the ends of justice from such an exclusion outweigh the best interest of the public and the defendants in a speedy trial. Specifically, the recent posture of the case makes it unreasonable to expect adequate preparation for trial preparation within the time limits established in the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(ii). Additionally, such an exclusion

1 provides counsel for the defense and the government reasonable time for effective preparation, taking
2 into account due diligence. 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

3 Based on the foregoing, the parties jointly and respectfully request that the Court issue the
4 proposed order excluding time under the Speedy Trial Act.

5 IT IS SO STIPULATED.

6 DATED: September 20, 2018

/s/ Hanni Fakhoury

HANNI M. FAKHOURY

Assistant Federal Public Defender

Counsel for Defendant Adam Shafi

ALEX G. TSE

United States Attorney

11 DATED: September 20, 2018

/s/ Elise LaPunzina

ELISE LAPUNZINA

S. WAQAR HASIB

Assistant United States Attorneys

[PROPOSED] ORDER TO EXCLUDE TIME

Based on the stipulation of the parties, the consent of the defendant, and on good cause shown, the Court orders that the time period from September 20, 2018, through and including the date set for trial before the District Court on September 27, 2018, is excluded under the Speedy Trial Act. The Court bases this exclusion of time and makes the findings as stipulated by the parties above.

IT IS SO ORDERED.

DATED: September __, 2018

HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE